NO. 13,916

CLAUDE J. TOMPLAIT

VS.

THE TRAVELERS INSURANCE COMPANY, ET AL

INTERROGATORIES TO PLAINTIFF, CLAUDE J. TOMPLAIT

FILED

17th Day of Sept. 1964

at 8:30 A M

ETHEL BURTON

Dist. District Court, Orange County, Texas

By Edna Ermon Deputy

ORGAIN, BELL & TUCKER

ATTORNEYS AT LAW

BEAUMONT, TEXAS

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CB:bh 9-16-64

NO. 13,916

CLAUDE J. TOMPLAIT	(	IN THE DISTRICT COURT
VS.	(	OF
THE TRAVELERS INSURANCE COMPANY, ET AL	(	ORANGE COUNTY, TEXAS

TO: CLAUDE J. TOMPLAIT, PLAINTIFF, AND HIS ATTORNEY OF RECORD, WARD STEPHENSON, STEPHENSON BUILDING, ORANGE, TEXAS:

Please take notice that Queen Insurance Company of America, defendant herein, requires plaintiff, Claude J. Tomplait to answer the following interrogatories, separately and fully in writing, and under oath, within fifteen (15) days from the date of service hereof, pursuant to Rule 168 of the Texas Rules of Civil Procedure:

DIRECT INTERROGATORIES
TO BE PROPOUNDED TO
CLAUDE J. TOMPLAIT

1. State your name.

2. Specify the name of each and every employer by whom you were employed during the period from April 22, 1963, to the date of your answers to these interrogatories, whether you were employed by another, or self-employed.

3. As to each employer designated in response to Interrogatory No. 2 above, specify the following:

(a) Date commenced employment.

(b) Date terminated employment.

(c) Hours worked each day.

(d) Number of days worked each week.

(e) Title or designation of job at which employed.

(f) Specific duties performed.

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(g) Location of job site.

(h) Location on job site at which your duties were performed.

(i) Kinds of tools used.

(j) Protective clothing or other protective devices used.

(k) Did you work with any type of insulating material on this job?

(l) If the answer to the foregoing interrogatory is "Yes", state the types of insulating material used by brand name.

(m) State what your duties were with respect to such insulating materials.

(n) State the name of your immediate supervisor.

(o) State the names of any fellow employees.

(p) What was your wage rate?

(q) What amount of money did you earn on this job?

(r) What insulating jobs were in progress at the job site while you were so employed?

4. Please give the name of all doctors who have treated you for any reason, or examined you for any reason, since July of 1961.

5. Please give the name of any hospital or clinic in which you have been confined or had treatment since July of 1961.

6. Please give the date of such confinements, if any.

ORGAIN, BELL & TUCKER
First Federal Savings Building
Beaumont, Texas
ATTORNEYS FOR QUEEN INSURANCE COMPANY OF AMERICA

By _____
Cleve Bachman

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The foregoing interrogatories were served by mailing a copy thereof in the United States Mail by Certified Mail, on the 16th day of September, 1964, to Ward Stephenson, Stephenson Building, Orange, Texas, Attorney for plaintiff.

Cleve Bachman

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